



**Region 5
LCD Field Activity Report
RRB, CAS 1**

Site Name: Miceli Drapery Company (former Aubrey Manufacturing)
Site Address: 6709 South Main Street, Union, Illinois
Site ID #: ILD 005 238 159 (former Aubrey Manufacturing)
Date: July 31, 2015

Purpose: Site Meeting and Tour as part of a No Further Action (NFA) determination for the facility.

EPA Author: Todd Gmitro

Signature/Date: Todd Gmitro August 3, 2015

Supervisor: Michael Beedle

Signature/Date: Michael Beedle 8/5/15

Participants

Todd Gmitro, EPA (312)886-5909; Michael Beedle, EPA (312)353-7922; John Miceli, Miceli Drapery Company (815)923-2063.

Summary

EPA arrived at the site at 11:00am and left at 2:00pm. EPA met with John Miceli, President, Miceli Drapery Company regarding the NFA that EPA is preparing for the Facility and then took a tour inside and outside the manufacturing building. The previous owner, Aubrey Manufacturing had interim status for a surface impoundment. The regulated unit was closed by IEPA in 2005. In 2009, Miceli Drapery bought the property after Aubrey was bought by a Canadian company and vacated the property.

As part of documenting the NFA determination, a final site tour was necessary to ensure that the previous SWMUs identified in the PA/VSI for the Facility had been removed; and that the current site operations are not causing any new environmental releases at the Facility. Aubrey had 8 identified SWMUs: the now closed surface impoundment; a waste oil accumulation area; a hydraulic oil accumulation area; wet spray paint rooms 1 and 2; a 90 day hazardous waste storage area; a water treatment system; and a hazardous waste satellite accumulation area. All these SWMUs are no longer present at the property. The current owner has completely refurbished the manufacturing building suitable for his drapery business. The current operation only produces a small amount of paint waste from a small spray booth. This is operated by a company that leases space to store and repair forklift counter weights. Used oil from a small on-site machine shop is also generated by the company. EPA did not find any evidence of potential or current releases to the environment from Miceli Drapery that would prevent making a NFA determination.

Photographs

EPA took three photographs of the site. These photographs are attached to this report.

Photo 1: Front entrance to the building

Photo 2: South side of the building looking west. Old surface Impoundment would have been under the building to the West. Loading docks and a trash dumpster.

Photo 3: West side of the building. Rusty bin and the blue tank are from the previous owner, Aubrey Manufacturing. Bin and Tank are both empty except for rain water, no releases were noticed.

Documents Copied

John Miceli provided electronic copies of the Phase I Environmental Site Assessment (ESA) that was prepared for the property in 2009 (1000 pages) including a July 31, 2008 Soil and Monitoring Well Report he had prepared for the property; and a February 9, 2015 Phase I ESA prepared for the sale of a portion of the property west of the manufacturing building. The 2009 ESA and 2008 soil and groundwater information was also provided to the IEPA in 2009.

Groundwater data from 2008 indicated similar contamination to that which was present in 2005. Attached are two letters that Mr. Miceli provided during the Site Visit: the final determination letter by the Phase I ESA environmental firm; and the IEPA letter (both dated November 3, 2009) indicating that no further action or investigations were required at the facility, and that IEPA's original 2005 closure documentation remains valid.



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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PAT QUINN, GOVERNOR

DOUGLAS P. SCOTT, DIRECTOR

217/524-3300

November 3, 2009

Certified Mail

7004 2510 0001 8615 7902

Marie Mueller
Manager, Chicago Office
Bureau Veritas North America, Inc.
2211 Butterfield Rd.
Downers Grove, Illinois 60515

Re: 1110905002 – McHenry County
Former Aubrey Manufacturing, Inc.
ILD005238159
Log No. PS09-195
RCRA Closure/PS Corr

Dear Ms. Mueller:

This is in response to a set of e-mails dated October 30, 2009 and November 2, 2009 from John Miceli, Jr. of Miceli Drapery Company. The e-mails address the results of a September 15, 2009 inspection by the Illinois EPA Des Plaines Field Operations Section (FOS).

In a November 11, 2005 Illinois EPA letter (Log No. C-686 (certification)), Aubrey Manufacturing received a final No Further Action (NFA) Determination for soil and groundwater issues at a former T02 surface impoundment located on the western portion of the facility. The NFA was based on closure efforts conducted pursuant to a 35 Ill. Adm. Code Part 742 (TACO) risk assessment. The closure utilized institutional controls to restrict groundwater in accordance with 35 Ill. Adm. Code 742, Subpart J.

On July 23, 2009, the Illinois EPA received a report that chlorinated solvent concentrations had been discovered in groundwater at the eastern portion of the facility at levels that exceeded those considered in the final TACO closure of the T02 surface impoundment. The facility was subsequently inspected by the Illinois EPA Des Plaines FOS on September 15, 2009. Upon Illinois EPA request, the facility submitted a copy of a document entitled, "Soil and Monitoring Well Sampling Report for 6709 South Main Street, Union, Illinois", dated July 31, 2008. The report provided recent soil and groundwater analytical data collected at the facility. That data was subsequently evaluated by Illinois EPA to determine if the recently observed groundwater results had any significant impact on the results of the TACO risk assessment that the September 11, 2005 NFA Determination was based on.

Based on the results of the September 15, 2009 Illinois EPA inspection and the information provided in the report entitled, "Soil and Monitoring Well Sampling Report for 6709 South Main

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Street, Union, Illinois", dated July 31, 2008, it has been determined that the November 11, 2005 NFA determination remains valid at this time. Therefore, no further action or investigation is necessary for any soil or groundwater issues associated with Illinois EPA Closure Log No. C-686.

Should you have any questions regarding groundwater issues please contact Scott Kaufman at 217/785-6869. For other matters, please contact James K. Moore, P.E. at 217/524-3300.

Sincerely,



Stephen F. Nightingale, P.E.
Manager, Permit Section
Bureau of Land

SFN:DSK:bjh\09581s.doc

DSK:bjh

cc: John Miceli, Jr.



TO: Small Business Growth Corporation ("Lender")
2401 West White Oaks Drive
Springfield, IL 62704

Date: November 3, 2009

And

U.S. Small Business Administration ("SBA")

Re: Borrower: Elephant Pennies, Inc.
Project Property: 6709 S. Main Street, Union, Illinois
Environmental Investigation Report Number(s): 07009-009035.10

Dear Lender & SBA:

Bureau Veritas North America, Inc. (Bureau Veritas) previously prepared a Phase I Environmental Site Assessment of the above referenced property (Bureau Veritas Project No. 07009-009035.10, dated October 2, 2009). The results of this ESA revealed no evidence of *recognized environmental conditions* in connection with the subject property, except for the following:

- **Former Aubrey Manufacturing Facility Operations**

Based on available information, the potential exists for soil/groundwater impact to be present beneath the building associated with past manufacturing operations. It is Bureau Veritas' opinion that the primary issue of concern at the subject property is the potential for groundwater impact. However, while groundwater sampling performed in conjunction with the "closure" of the surface impoundment indicated the presence of some residual solvent contamination down-gradient of the building, the data did not suggest the presence of "gross" impact. Recently obtained groundwater sampling data indicated slightly elevated concentrations of selected volatile organic compounds in one down-gradient well (i.e., *Soil and Groundwater Well Sampling Report for 6709 S. Main Street, Union, Illinois*, dated July 31, 2008, prepared by Pepper Environmental Technologies). However, this well was located on the subject property (approximately 20 feet from the eastern property line) and, to date, offsite groundwater impact has not been definitively identified (i.e., only the *potential* for this impact, as demonstrated through groundwater modeling). The only way to definitively verify the presence/absence of this impact would be through additional groundwater sampling, preferably at the down-gradient property line.

The Illinois Environmental Protection Agency recently made a visit to the subject property, in response to the July 2008 sampling results. The Agency obtained a copy of the July 31, 2008 report and evaluated the data to determine if it had a significant impact on the previous "closure." We have recently received a copy of a letter prepared by the Agency to address this issue (copy enclosed, submitted on November 3, 2009). The Agency letter indicated the following:

Based on the results of the September 15, 2009 Illinois EPA inspection and the information provided in the report entitled, "Soil and Monitoring Well Sampling Report for 6709 South Main

Bureau Veritas North America, Inc.

Health, Safety, and Environmental Services

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Downers Grove, IL 60515

Follow up Letter-Ver 2-6709 S Main, Union, IL

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Street, Union, Illinois", dated July 31, 2008, it has been determined that the November 11, 2005 NFA determination remains valid at this time. Therefore, no further action or investigation is necessary for any soil or groundwater issues associated with Illinois EPA Closure Log No. C-686.

Based on the above noted letter from the Illinois Environmental Protection Agency, it is Bureau Veritas' opinion that no further investigation or remediation is warranted at the subject property at this time.

If there are any questions regarding this letter please contact either of the undersigned at (630) 795-3200.

Respectfully submitted,

Bureau Veritas North America, Inc.

Environmental Professional

Marie E. Mueller

Printed Name

(Note: The Environmental Professional must always sign this letter above. If the Environmental Professional is employed or retained by an Environmental Firm, then an authorized representative of the firm must also sign below).

Signature of representative of firm who is authorized to sign this letter

Russell J. Chadwick, P.G., Vice President Midwest Region
Printed Name & Title

Bureau Veritas North America, Inc.
Name of Environmental Firm

Attachment

ecil. Photo 1 by Mike Beedle 7/31/15 Miceli



Mecili Photo 2 by Mike Beedle 7/31/15



Meati Photo 3 by Mike Beedle 7/31/15



